

SUPERIOR COURT OF N.J.  
FILED

OCT 18 2007

*[Handwritten signature]*  
CLERK

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ 544-07-19

Superior Court

Docket Number 07-10-00144-S

STATE OF NEW JERSEY )

v. )

INDICTMENT

NICOLE ALI )

CLARK DEMETRO )

DAWN MICHELLE BROWN )

and )

THERESA ANN MILLS )

The Grand Jurors of and for the State of New Jersey, upon their  
oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

NICOLE ALI

CLARK DEMETRO

DAWN MICHELLE BROWN

and

THERESA ANN MILLS

between on or about May 5, 2004 and on or about December 3, 2004, at  
the City of Camden, in the County of Camden, elsewhere, and within  
the jurisdiction of this Court, with the purpose of promoting or  
facilitating the commission of the crimes of Official Misconduct and

Bribery, did agree together and with other persons, whose identities are known to the Grand Jurors, but who are not named as defendants herein that:

- A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or
- B. One or more of them knowingly would aid in the planning, solicitation, or commission of said crimes, that is:
  - 1. Official misconduct, in that one or more of them with the purpose to obtain a benefit for herself or another would commit an act relating to his office but constituting an unauthorized exercise of her official functions, knowing that such act is unauthorized or would commit such an act in an unauthorized manner, or would knowingly refrain from performing a duty which is imposed upon her by law or is clearly inherent in the nature of her office, that is, the said NICOLE ALI, DAWN MICHELLE BROWN, and THERESA ANN MILLS knowingly would issue New Jersey Motor Vehicle Commission documents without obtaining proper identification for the benefit of their co-conspirator, the said CLARK DEMETRO, and others, whose identities are unknown to the Grand Jurors and who are not named as defendants herein, contrary to the provisions of N.J.S.A. 2C:30-2;

2. Bribery in official matters, in that one or more of them knowingly would directly or indirectly offer, confer or agree to confer upon another or would solicit, accept or agree to accept from another a benefit having a value of \$200 or less as consideration for a violation of an official duty of a public servant or as consideration for the performance of official duties, contrary to the provisions of N.J.S.A. 2C:27-2.

All contrary to the provisions of N.J.S.A. 2C:5-2, and against the peace of the State, the government and dignity of the same.

COUNT TWO

(Official Misconduct - Second Degree)

NICOLE ALI

CLARK DEMETRO

DAWN MICHELLE BROWN

and

THERESA ANN MILLS

between on or about May 5, 2004 and on or about December 3, 2004, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the commission of the offense did aid in the commission of, or did commit the offense of official misconduct, the said NICOLE ALI, DAWN MICHELLE BROWN, and THERESA ANN MILLS, with purpose to obtain a benefit for themselves or another or to injure or deprive another of a benefit, did commit an act relating to their duties as New Jersey Motor Vehicle Commission Customer Service Representatives, but constituting an unauthorized exercise of their official functions, knowing that such act was unauthorized, that is, the said NICOLE ALI, DAWN MICHELLE BROWN, and THERESA ANN MILLS, while employed as Customer Service Representatives at the New Jersey Motor Vehicle Commission, thereby performing a governmental function, having thereby the official functions and duties, among others to perform their duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to

corrupting influences, with purpose to obtain a benefit for themselves or another, knowing that such act was unauthorized, knowingly did provide a benefit to the said CLARK DEMETRO, and others, whose identities are unknown to the Grand Jurors and who are not named as defendants herein, by issuing New Jersey Motor Vehicle Commission Identification Only Cards and other New Jersey Motor Vehicle Commission documentation without obtaining proper identification, knowing that such acts were unauthorized or that they were committing such acts in an unauthorized manner, contrary to the provisions of N.J.S.A. 2C:30-2a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Bribery - Third Degree)

NICOLE ALI

CLARK DEMETRO

DAWN MICHELLE BROWN

and

THERESA ANN MILLS

between on or about May 5, 2004 and on or about December 3, 2004, at the City of Camden, in the County of Camden, elsewhere, and within the jurisdiction of this Court, knowingly did directly or indirectly offer, confer, or agree to confer upon another, or solicit, accept or agree to accept from another a benefit not authorized by law, as consideration for the violation of an official duty of a public servant, or for the performance of an official duty; that is, the said NICOLE ALI, the said DAWN MICHELLE BROWN, and the said THERESA ANN MILLS, while employed as Customer Service Representatives at the New Jersey Motor Vehicle Commission, did accept a benefit having a value of \$200 or less, which was offered or conferred either directly or indirectly from their co-conspirator, the said CLARK DEMETRO, as consideration for issuing New Jersey Motor Vehicle Commission Identification Only Cards and other New Jersey Motor Vehicle Commission documentation, contrary to the provisions of

N.J.S.A. 2C:27-2c, N.J.S.A. 2C:27-2d, and N.J.S.A. 2C:2-6, and  
against the peace of the State, the government and the dignity of  
the same.

COUNT FOUR

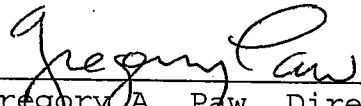
(Pattern of Official Misconduct - Second Degree)

NICOLE ALI

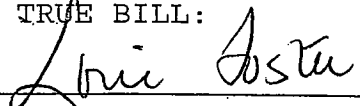
and

THERESA ANN MILLS

between on or about May 5, 2004 and December 3, 2004, at the City of Camden, in the County of Camden, elsewhere and within the jurisdiction of this Court, did commit two or more acts of Official Misconduct, each in violation of N.J.S.A. 2C:30-2, that is, the said NICOLE ALI and THERESA ANN MILLS, then and there being public servants, to wit: clerks at the New Jersey Motor Vehicle Commission, having thereby the official functions and duties, among others, to perform their duties in a legal and proper manner, to display good faith, honesty and integrity, and to be impervious to corrupting influences, did commit two or more acts of Official Misconduct as charged in Count 2 of this indictment, contrary to the provisions of N.J.S.A. 2C:30-7, and against the peace of this State, the government and dignity of the same.

  
\_\_\_\_\_  
Gregory A. Paw, Director  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_  
Foreperson

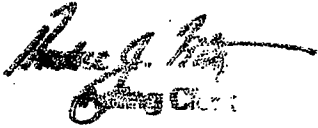
Date: 10/18/07



SUPERIOR COURT OF N.J.  
FILED

OCT 18 2007

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL



State Grand Jury

Number SGJ544-07-19

Superior Court

Docket Number 07-10-00144-S

STATE OF NEW JERSEY )

v. )

ORDER OF VENUE

NICOLE ALI )

CLARK DEMETRO )

DAWN MICHELLE BROWN )

and )

THERESA ANN MILLS )

An Indictment having been returned to this Court by the  
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 18<sup>th</sup> day of October, 2007,  
pursuant to paragraph 8 of the State Grand Jury Act, that the  
County of Camden be and hereby is designated as the County of venue  
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court  
shall transmit forthwith the Indictment in this matter and a  
certified copy of this Order to the Criminal Division Manager of  
the County of Camden for filing.

